



## Campaigning for the Conservation of Wild Land in Scotland

*Publisher of Scottish Wild Land News*

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Dear Sir

**Application: 17/02816/FUL; Upgrading existing peat tracks to make narrow stone tracks, Camusrory Lodge, Loch Nevis, Morar, Mallaig.**

I am writing on behalf of the Scottish Wild Land Group to make a holding **objection** to this development proposal. This is based on the following grounds:

**Wild Land Area** – the proposed track is in a Wild Land Area [WLA]. If it is consented then there is a possibility, considering the landform and location involved, that further inappropriate intrusion would be facilitated, and this would lead to further attrition of the WLA. There would be a temptation to ride machines further into the WLA and beyond the end of the proposed track. This would also set a precedent for other landowners/managers with sensitive sites, to apply for “track upgrades” which are really only ATV tracks, not permanent long standing tracks. In this case the track referred to is not a track as such, but the rutted line of ATV usage across peat. There is no recognised existing track to be upgraded. The applicant should be required to submit a Wild Land Assessment.

**Justification for the track:** Deer have been extracted from this area for years. So why is a new track needed now? How have carcasses been removed until now? If the applicant is claiming that the track is needed for deer extraction then they should be expected to justify this by presenting their Deer Management Plan with anticipated culling data and previous data. We accept that having an operating Deer Management Plan in place and following it is not a legal requirement, but if the estate is justifying need for the track then this should be demonstrated. We are concerned that The Highland Council might accept grounds for justification on the basis of the estate trying/intending to comply with SNH guidance on culling levels, again this would set a precedent for others and should be guarded against.

**Construction details:** There is insufficient information given to enable judgement to be made. We have heard that some of this construction work has already been undertaken and the track is wider



than that proposed in the application. If that is the case then this would be most inappropriate; we have not visited the site to verify this however. Our specific points of concern are:

- The applicant has submitted a diagram from the SNH upland hilltrack construction guidance, however, with a track of this length, over the terrain involved, site specific diagrams for each track section are required.
- The term “narrow track” is described as 4 to 5 ft wide and up to 6 ft. This would need to be adhered to and guaranteed by the contractor. The track must not be suitable for argocats or 4x4 vehicles.
- There needs to be more detail on borrow pits – their location, size, depth, restoration.
- Material to be used – there is again omission of essential detail particularly on source of material [can enough be supplied from local borrow pits? The track is several kms long], how locally gained rocks will be processed, how dust and waste management from rock crushing and breaking will be achieved, how additional material will be transported onto the site, and so on.
- There is insufficient detail on how the vegetation would be removed, stored, maintained in good condition during construction and replaced/used on any bare ground left after construction.
- Reseeding is mentioned but there is no description of the range of species to be used. No new species should be introduced such as fast growing grasses that are not native to local ecosystems, as this would impact on local ecology.
- There are no details of construction site plans or location and how any damage will be avoided and any necessary restoration achieved.
- There is no information on how material will be transported onto, around and along the site and stored as necessary, and how damage will be restored.
- The track is depicted as crossing the river Carnach by fords at two locations. We consider that bridges would be preferable in order to prevent any damage of the river banks and to thus reduce silting of the rivers. Silting avoidance techniques of water courses should be specified. In addition there are also tributaries to be crossed. Diffuse pollution should be guarded against by consultation with SEPA and following their developed guidance on this.
- There is no consideration of alternatives – as the area is very peaty it might be preferable to use floating roads which might be less invasive in some places.
- Peat damage – this is mentioned, but there are no details on the potential extent of damage that could be caused by construction and how this will be avoided and conservation achieved. No peat survey is included with the application.
- There is no Design Statement

**Natural heritage features:** the application does not include an ecological assessment. It appears that no impact assessment on the disturbance that may be caused during construction and subsequent

use of the track on nearby sensitive ecosystems, and individual flora and fauna species has been submitted with the application.

For the reasons above, SWLG has decided to object to this application, at least until the applicant has addressed the points we are concerned about. If the applicant is asked to resubmit a more informative proposal then we are prepared to undertake to review our position should further scrutiny show the revised proposal is might lead to a satisfactory outcome. Hence this can be considered to be a holding objection. We note that the original planning reference for the track was 17/02140/PNO, which suggests that the applicant originally submitted a prior notification; presumably The Highland Council recognised that a full application is required and this resulted in the current application.

Should consent be given, whether to this incomplete proposal or a revised one that addresses the lack of information currently available, then there must be monitoring of the construction phase to ensure that conditions, original proposals and agreements are complied with, especially regarding track width.

Should you have any queries concerning points raised in this letter, please do not hesitate to contact me.

Yours sincerely

Beryl Leatherland  
[Convenor]